

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

In the Matter of )  
 )  
Review of Part 87 of the ) WT Docket No. 01-289  
Commission's Rules Concerning )  
The Aviation Radio Service )

**COMMENTS OF Continental Airlines**

Continental Airlines hereby submits these comments in response to the Second Further Notice of Proposed Rulemaking (“Second FNPRM”) in above-captioned proceeding.<sup>1</sup> Continental Airlines is the world’s fifth largest airline. Continental, together with Continental Express and Continental Connection, has more than 3,100 daily departures throughout the Americas, Europe and Asia, serving 150 domestic and 136 international destinations. More than 400 additional points are served via SkyTeam alliance airlines. With more than 44,000 employees, Continental has hubs serving New York, Houston, Cleveland and Guam, and together with Continental Express, carries approximately 67 million passengers per year. Continental consistently earns awards and critical acclaim for both its operation and its corporate culture.

In the Second FNPRM, the Commission asked for comments regarding proposed changes to Part 87 of its rules, which provides, among other things, for licensing of stations in the Aeronautical Mobile Satellite (Route) Service (“AMS(R)S”). AMS(R)S is an aeronautical mobile-satellite service reserved for communications relating to safety and regularity of flights, primarily along national and international civil air routes. The Commission has asked whether it should broaden Part 87 to permit additional mobile

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<sup>1</sup> *In the Matter of Review of Part 87 of the Commission's Rules Concerning the Aviation Radio Service, Second Report and Order and Second Further Notice of Proposed Rulemaking, WT Docket No. 01-289, FCC No. 06-148 (rel. Oct. 10, 2006) (“Second FNPRM”).*

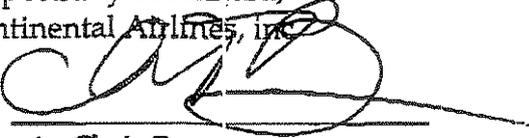
satellite service ("MSS") providers, including those operating in the 1.6 GHz band, to provide AMS(R)S,<sup>2</sup>

Continental Airlines supports the Commission licensing Iridium for AMS(R)S and therefore urges the Commission to adopt rules that would enable Iridium to provide AMS(R)S service on its 1.6GHz frequencies. Continental Airlines flies to numerous destinations that take its planes over land masses and bodies of water in multiple areas. Iridium's system is uniquely suited to serve Continental's AMS(R)S requirements. The system has complete coverage of the earth, including oceans, airways and Polar Regions. Making Iridium's system available for AMS(R)S purposes will enhance flight safety by giving Continental access to Iridium's unparalleled coverage,

#### CONCLUSION

For the reasons stated above, the Commission should extend Part 87A IS(R)S eligibility to Iridium as soon as possible.

Respectfully submitted,  
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<sup>2</sup> Second FNPRM at ¶ ¶ 29-32.